

EXHIBIT 12

**Declaration of Elizabeth Sbardellati
Declaration, Case No. 15-cv-3378,
Dkt. No. 322-11 (Jan. 6, 2017)**

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GOLDEN BOY PROMOTIONS, LLC,
GOLDEN BOY PROMOTIONS, INC.
and BERNARD HOPKINS,

Plaintiffs,

v.

ALAN HAYMON, ALAN HAYMON
DEVELOPMENT, INC., HAYMON
HOLDINGS, LLC, HAYMON
SPORTS, LLC, HAYMON BOXING
MANAGEMENT, HAYMON
BOXING LLC, and RYAN
CALDWELL,

Defendants.

Case No. 2:15-cv-03378 JFW (MRWx)

Assigned to Hon. John F. Walter

**DECLARATION OF ELIZABETH
SBARDELLATI IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION IN
LIMINE NO. 1 TO EXCLUDE THE
TESTIMONY OF GENE DEETZ**

[Defendants' Motion in Limine No. 1
and Declaration of Adam Wolfson filed
concurrently herewith]

Complaint Filed: May 5, 2015

SAC Filed: January 20, 2016

Final Pre-Trial Conference:

January 20, 2017

Hearing on Motions in Limine:

February 10, 2017

Trial: March 14, 2017

DECLARATION OF ELIZABETH SBARDELLATI

I, Elizabeth Sbardellati, declare as follows:

1. I am a member of the bar of the State of California, and an associate at Greenberg Glusker Fields Claman and Machtinger LLP, attorneys for Plaintiffs Golden Boy Promotions, Inc., Golden Boy Promotions LLC, and Bernard Hopkins (“Plaintiffs”).

2. I submit this declaration in support of Plaintiffs’ Opposition to Defendants’ Motion in Limine No. 1 to Exclude the Testimony of Gene Deetz. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify as set forth below.

3. Attached hereto as Exhibit 1 are true and correct copies of relevant pages from the Expert Report of Robert Kneuper, Ph.D., dated September 6, 2016 (“Kneuper Report”).

4. Attached hereto as Exhibit 2 are true and correct copies of relevant pages from the Expert Report of Gene Deetz, dated September 6, 2016 (“Deetz Report”).

5. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit 3 to the Expert Report of Gene Deetz, as revised and produced to Defendants on October 18, 2016 (“Exhibit 3 (Revised)”).

6. Attached hereto as Exhibit 4 are true and correct copies of relevant pages from the Expert Report of Michael P. Smith, Ph.D., dated September 27, 2016 (“Smith Report”).

7. Attached hereto as Exhibit 5 are true and correct copies of excerpts from the October 19, 2016 deposition of Gene Deetz (“Deetz Depo.”).

8. Attached hereto as Exhibit 6 are true and correct copies of excerpts from the September 28, 2016 deposition of Roberto Diaz (“Diaz Depo.”)

